

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE DISTRICT OF PUERTO RICO

VICTOR M. MALDONADO
MORALES

CASE 08-01696
CHATER 13

DEBTOR

RG PREMIER
Movant

INDEX

JOSE CARRION
TRUSTEE

REPLY TO Motion Requesting Relief of Stay

TO THE HONORABLE COURT:

COMES NOW DEBTOR, through his undersigned attorney and respectfully states and prays:

- 1- That secured creditor RG PREMIER filed a Motion Requesting Relief of Stay Under 11 USC 362 grounded on debtor's arrears with his post petition Mortgage payments.
- 2- That secured creditors RG Premier will be pay in full through the Chapter 13 plan payments. (See docket 44- Trustee posistion).
- 3- Debtor is current with his Chapter 13 plan payments.

WHEREFORE, DEBTOR requests that the Motion for relief of Stay under 11 U.S.C 362 be denied.

RESPECTFULLY SUBMITTED.
In San Juan Puerto Rico, March 28th ,2009

CERTIFICATE OF SERVICE: That I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing and that I have mailed the documents to the and non CM/ECF participants, Creditors and parties in interest as per the Master address list.

/S/WILBERTLOPEZ MORENO
Representing Victor M.
Maldonado Morales
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Label Matrix for local noticing

0104-3

Case 08-01696-ESL13

District of Puerto Rico

Old San Juan

Sat Mar 28 11:48:06 AST 2009

US Bankruptcy Court District of P.R.

U.S. Post Office and Courthouse Building

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

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End of Label Matrix

Mailable recipients 14

Bypassed recipients 0

Total 14